



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 09 2013

REPLY TO THE ATTENTION OF:

Don Faith III
Air Management Engineer
Bureau of Air Management
Wisconsin Department of Natural Resources
PO Box 7921
Madison, Wisconsin 53707-7921

RE: Comments on Proposed New Source Review Permits for Enbridge Energy Co.


Dear Mr. Faith,

The U.S. Environmental Protection Agency has reviewed the proposed New Source Review permits, permit number 12-DCF-205, for Enbridge Energy Co. in Superior, Wisconsin. To ensure that the source meets Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comment:

The Wisconsin Department of Natural Resources included a Best Available Control Technology (BACT) analysis pursuant to 40 C.F.R. §52.21 and s. NR 405.08 as part of this permit action. The BACT analysis included an assessment that the economic impacts for controlling leaks using seal-less valves or double-seal pumps, which were determined to be excessive and therefore, were not required. EPA believes that some effective, lower cost control options were not considered as part of this analysis such as low emission valve stem packing. Please take these options into consideration in your economic analysis.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please contact me or contact Monika Lacka, of my staff, at (312) 353-6556.

Sincerely,


Genevieve Damico
Chief
Air Permits Section